

# EXHIBIT 67

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

*ROCHELLE GLASGOW, et al.*, ) CASE NO. 5:21-cv-02001-DAR  
Plaintiffs, )  
v. ) JUDGE DAVID A. RUIZ  
*DANIEL J. BEERS, et al.*, )  
Defendants. )  
 )  
 ) **DECLARATION OF PLAINTIFF**  
 ) **ROCHELLE GLASGOW IN SUPPORT OF**  
 ) **PLAINTIFFS' MOTION FOR CLASS**  
 ) **CERTIFICATION**  
 )  
 )

I, Rochelle Glasgow, declare as follows:

1. I am a Plaintiff in this case and am willing to serve as a Class Representative in this case. The statements herein are based on my personal knowledge and experiences with Liberty HealthShare. I submit this declaration in support of the Plaintiffs' Motion for Class Certification in the above-captioned matter.
2. I first learned about Liberty HealthShare from my sister Donna Landry, who suggested I look into it. I was self-employed at the time she joined Liberty HealthShare and, as such, did not have access to employer-provided health insurance. This circumstance made alternative healthcare coverage options, such as Liberty HealthShare, attractive to me.
3. After my sister Donna Landry's recommendation, I performed some of her own research online. I noted that Liberty HealthShare was a faith-based ministry, which I considered a good thing. The faith-based and values-oriented marketing of Liberty HealthShare made a favorable impression on me, and I believed Liberty HealthShare valued fairness, honesty, and helping others. I joined in part because I was aligned with Liberty HealthShare's broader values and was able to agree to the statements of belief based on general ethical principles of

kindness, honesty, and fairness, rather than strict religious observance.

4. I was also motivated to join Liberty HealthShare in order to have my medical needs taken care of, and I believed and trusted Liberty HealthShare would serve this purpose. Monthly costs were also a consideration, and my monthly health care costs increased after I left Liberty HealthShare for UnitedHealthcare.
5. Before joining Liberty HealthShare, I was covered by Pacific Source with a Health Savings Account. My shift to Liberty HealthShare was driven by my transition to self-employment and the resulting lack of employer health insurance options. I understood the general concept that as a member I would pay into a pool of money, and payments would be shared among those in need, and I believed Liberty HealthShare would perform a similar function as health insurance.
6. I decided to sue Liberty HealthShare for numerous reasons, including (1) the slow payment or non-payment of medical bills (including going into collections), (2) unreimbursed out-of-pocket medical expenses, (3) the emotional and practical toll of persistent disputes and lack of clear resolution from Liberty, (4) because Liberty has collected monthly share payments and administrative fees but then diverted funds to related entities at high rates, thus depriving members of the financial help promised for medical needs, and (5) my desire to prevent other Liberty HealthShare members from suffering the same treatment, including Liberty HealthShare failing to provide the coverage that purchasers, including myself, believed they would receive.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 28th day of July, 2025.

/s/ Rochelle Glasgow  
Rochelle Glasgow